

**Federal Defenders  
OF NEW YORK, INC.**

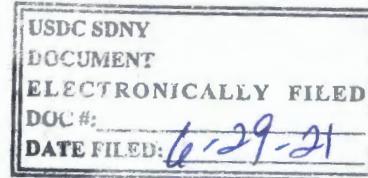
Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

June 25, 2021

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



**Re: United States v. Rickey Johnson  
21 CR 194 (LAK)**

Dear Judge Kaplan:

With the consent of the Government, I write to request an extension of the deadline for pretrial motions in the above-referenced matter. The Government has disclosed to the defense hundreds of videos and photos in reference to this case, and anticipates an additional discovery production by the end of next week. The exact size of this production is unknown at the filing of this letter but is expected to include additional video and electronic data. As the Court is aware, Mr. Johnson is currently incarcerated at the MDC Brooklyn and has limited access to a computer to review his digital discovery. I need additional time to review the voluminous discovery and the anticipated discovery with Mr. Johnson before filing pretrial motions. Therefore, with the Government's consent, I respectfully request that the Court endorse the following schedule:

- Mr. Johnson's pretrial motions due by August 13, 2021.
- Government response by August 27, 2021.
- Mr. Johnson's reply by September 3, 2021.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

cc: Patrick Moroney  
Assistant United States Attorney

*Granted*  
SO ORDERED  
*Mr. Kaplan*  
LEWIS A. KAPLAN, USDJ  
6/29/21